

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

C.A. No. 03-12379 MLW

\_\_\_\_\_  
EMORY ZIPPERER  
Plaintiff,

v.

\_\_\_\_\_  
RAYTHEON COMPANY, INC.  
Defendant.  
\_\_\_\_\_

**AFFIDAVIT OF EVANS W. CHEESEMAN, JR.**

I, Evans W. Cheeseman, Jr., upon oath hereby depose and state as follows:

1. I am Manager, Pension Administration, for Raytheon Company ("Raytheon"). I am currently responsible for supervising the work of Raytheon's consultants with respect to administration of the pension plans the company sponsors for its United States employees.

2. These pension plans include the Raytheon Engineers & Constructors, Inc. pension plan. In my role as Manager, I have reviewed copies of the documents relating to the pension plan attached to this affidavit.

3. Attached hereto as Exhibit A is the Raytheon Engineers & Constructors, Inc. Retirement Plan.

4. Attached hereto as Exhibit B is a Request for Retirement Calculations dated 12/27/99 addressed to W. Scott Bishop.

5. Attached hereto as Exhibit C is a letter dated February 16, 2000 from W. Scott Bishop to E. B. Zipperer.

6. Attached hereto as Exhibit D is a letter dated October 5, 2000 from the Raytheon Benefit Center to Emory Zipperer.

7. Attached hereto as Exhibit E is a letter dated October 3, 2001 from Ched D. Miller, Secretary, Raytheon Benefit Appeals Committee to Emory B. Zipperer.

8. Emory Zipperer is currently receiving the correct amount of pension benefits due to him under the Raytheon Engineers & Constructors, Inc. Retirement Plan.

SUBSCRIBED AND SWORN TO UNDER THE PAINS AND PENALTIES OF PERJURY  
THIS 28th DAY OF February, 2005.

/s/ Evans W. Cheeseman, Jr.  
Evans W. Cheeseman, Jr.

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**EXHIBITS TO AFFIDAVIT OF EVANS W. CHEESEMAN, JR.**

Hard copies of exhibits filed directly with the U.S. District Court of Massachusetts on March 1, 2005.

/s/ Constance M. McGrane  
James F. Kavanaugh, Jr. (BBO# 262360)  
Constance M. McGrane (BBO# 546745)  
CONN KAVANAUGH ROSENTHAL  
PEISCH & FORD, LLP  
Ten Post Office Square  
Boston, MA 02109  
(617) 482-8200

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the Affidavit of Evans W. Cheeseman, Jr.  
was served upon the attorney of record for each other party by mail on March 1, 2005.

/s/ Constance M. McGrane  
Constance M. McGrane, Esq.